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July 31, 2023

Via ECF

Hon. Victoria Reznik
United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: File: 00194-Fishman
Marc Fishman v City of New Rochelle, et al
Case Number: 19-cv-00265-NSR

Dear Magistrate Judge Reznik:

I represent the plaintiff, Marc Fishman. I submit the following upon request of all parties for the entry of a confidentiality stipulation and protective order.

Pending entry of this proposed order, plaintiff requests the motion to compel be held in abeyance as duly signed HIPPA authorizations cannot be provided until a confidentiality stipulation is so ordered. Plaintiff will also separately oppose the motion to compel on relevancy grounds as the defense had previously conceded plaintiff is disabled and this is nothing short of a fishing expedition.

Respectfully submitted,

Caner Demirayak
Caner Demirayak, Esq.

CC: Defense counsel via ECF